

# **Exhibit EEE**

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

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SIRI DIAZ, CAROLYN SIEGEL, TALIA BUMB,  
BLERTA VIKKI, DANIELLE OWIMRIN, on  
behalf of themselves and all others  
similarly situated,

Plaintiffs,

- against -

SCORES HOLDING COMPANY, INC., GO WEST  
ENTERTAINMENT, INC., a/k/a SCORES WEST  
SIDE; and SCORES ENTERTAINMENT, INC.,  
a/k/a SCORES EAST SIDE,

Defendants.

Case No. 07 Civ. 8718 (RMB)

-----X  
200 Park Avenue  
New York, New York

January 24, 2008  
4:05 p.m.

Deposition of TALIA BUMB, before  
Marlene Lee, CSR, CRR, a Notary Public of the  
State of New York.

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1 BUMB

2 Q. Which was during training?

3 A. Yes.

4 Q. Tell me about -- tell me what  
5 happened when you got to the club on that  
6 Sunday for training. What time did you get  
7 there?

8 A. I don't remember what time I came  
9 in.

10 Q. What happened once you got there?

11 A. Once I got there, I met with  
12 Anelise.

13 Q. Were you already in your uniform?

14 A. No. I changed into my uniform when  
15 I got there.

16 Q. Where did you get the uniform from?

17 A. From Alberto.

18 Q. When did Alberto give you the  
19 uniform?

20 A. He gave it to me my first day of  
21 training.

22 Q. On that Sunday?

23 A. Yeah.

24 Q. So did you first speak to Alberto  
25 on that Sunday? Or did you first speak to

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2 Anelise?

3 A. I don't recall who I spoke with  
4 first.

5 Q. But at some point Alberto gave you  
6 the uniform.

7 A. Yes.

8 Q. Did you have any conversation at  
9 the time he gave you the uniform?

10 A. He said it will be taken out of my  
11 check.

12 Q. He said that?

13 A. Yeah.

14 Q. Did you ever notice if it was taken  
15 out of your check?

16 A. I never -- I never looked at the --  
17 yeah. I never checked to see, I mean.

18 Q. Did he say how much would be taken  
19 out of your check?

20 A. He said it would be \$50 out of the  
21 first check and \$50 out of the second check.

22 Q. Did you ever have any response to  
23 that?

24 A. What do you mean? What do you mean  
25 by that?

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2 Q. When he told you that you'd have  
3 \$50 taken out of your first check and \$50 taken  
4 out of your second check for the uniform -- is  
5 that what HE told you?

6 A. Yes.

7 Q. -- did you respond in any way to  
8 that statement?

9 A. No. Not that I recall.

10 Q. But you never looked at your  
11 paycheck to see if \$50 was ever taken out of  
12 it?

13 A. No.

14 Q. Did you have any other conversation  
15 with Alberto on that Sunday night when you  
16 first went for training?

17 A. I'm sure I did.

18 Q. Anything that you remember?

19 A. Not anything I remember.

20 Q. But you also said you spoke to  
21 Anelise that night.

22 A. Yes.

23 Q. Tell me what happened when you  
24 spoke to Anelise.

25 A. She was training me, so she was

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2 showing me how to use the computer system and  
3 how to serve the drinks and interact with the  
4 bartender, et cetera...

5 Q. Did she explain any other aspect of  
6 the job to you?

7 A. Yeah, I'm sure she did.

8 Q. Anything that you can remember?

9 A. Not that I recall at this time.

10 Q. What did she tell you about how you  
11 should interact with the bartender?

12 A. What did she tell me about  
13 interacting with the bartender?

14 Q. Yes.

15 A. She was showing me, like, how to --  
16 the computer prints out our order, and how do I  
17 take the order to the bartender so that they  
18 can make the drinks.

19 Q. Okay. Anything else?

20 A. Not that I recall at this time.

21 Q. How long was your time there for  
22 training on that Sunday?

23 A. For a couple of hours.

24 Q. And were you in uniform at that  
25 time?

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2 Q. Are the bartenders counting their  
3 tips?

4 A. Yes.

5 Q. The barbacks?

6 A. No.

7 Q. They're waiting to receive tips  
8 from you and the bartenders?

9 A. Yes.

10 Q. Did they get tips from any other  
11 source?

12 A. I'm not sure. I don't know.

13 Q. Who physically gave the money to  
14 the bartenders?

15 A. During what transaction?

16 Q. This cash-out procedure you're  
17 talking about.

18 A. Who gave money physically to the  
19 bartenders?

20 Q. Who physically gave your portion of  
21 tips to the bartender?

22 A. We personally, physically, gave it.

23 Q. So you personally handed it to the  
24 bartender?

25 A. Yes.



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2 Q. Do you remember any of the  
3 bartenders who you personally handed it to?

4 A. I remember one bartender named  
5 Rose.

6 Q. Rose?

7 A. Yeah.

8 Q. Anyone else?

9 A. That's the only name I remember.

10 Q. And what about the barbacks? Did  
11 you physically hand money to the barbacks as  
12 well?

13 A. I don't recall.

14 Q. Do you remember the names of any of  
15 the barbacks?

16 A. No, I don't. I know I gave the  
17 money for the barbacks to someone. I just  
18 can't remember if we gave it to a manager to  
19 give to them, or directly to the barback. I  
20 know I gave money to them. I just can't  
21 remember who I gave it to directly.

22 Q. Was anybody else involved in this  
23 tip-sharing?

24 A. I only recall the waitresses,  
25 barbacks, bartenders, and the managers being

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2 there.

3 Q. Did the manager get a share of the  
4 tips?

5 A. Not that I know of.

6 Q. Did this process happen on every  
7 day that you worked there?

8 A. Yes.

9 Q. And did you work till cash-out on  
10 every day that you worked?

11 A. Yes, I did.

12 Q. And --

13 A. Except the training days.

14 Q. Right. The training days you  
15 didn't work that late.

16 A. Correct.

17 Q. But the days starting after  
18 training, you worked all the way till cash-out.

19 A. Yes.

20 Q. So after the cash-out, after you've  
21 given the monies to the bartenders and

22 barbacks, then what happens?

23 A. Then we go change into our street  
24 clothes and go home.

25 Q. When do you clock out?

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2 A. After we -- well, I would always  
3 forget to clock out. Honestly, I don't know.

4 Q. Do you know when you were supposed  
5 to clock out?

6 A. No.

7 Q. So you went directly from counting  
8 your money, telling the manager what your --  
9 how much tips you earned that evening, handing  
10 the shares to the bartender and the barbacks,  
11 to changing your clothes --

12 A. Yes.

13 Q. --and leaving?

14 A. Yes.

15 Q. And that's the process you followed  
16 every evening that you worked?

17 A. Yeah.

18 Q. Do you remember the names of any of  
19 the managers that oversaw or sat there when you  
20 were counting your tips?

21 A. I only remember Alberto.

22 Q. How many days in total did you  
23 work, other than training?

24 A. Total time I was there?

25 Q. Yeah.